

VP JRB USAO 2019R00038

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**STEPHEN WILLIAM SPROUL,**

**Defendant**

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**CRIMINAL NO.**

**(Possession of Child Pornography,  
18 U.S.C. § 2252A(a)(5)(B) and (b)(2);  
Forfeiture, 18 U.S.C. § 2253, 21 U.S.C.  
§ 853, 28 U.S.C. § 2461(c))**

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**INFORMATION**

**COUNT ONE**

**(Possession of Child Pornography)**

The United States Attorney for the District of Maryland charges that:

On or about April 8, 2016, in the District of Maryland, the defendant,

**STEPHEN WILLIAM SPROUL,**

did knowingly possess any material that contained an image of child pornography, as defined in 18 U.S.C. § 2256(8)(A), including an image of child pornography involving a prepubescent minor and a minor who had not attained 12 years of age, which had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

**FORFEITURE ALLEGATION**

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to 18 U.S.C. § 2253, upon conviction of the offenses set forth in Count One of this Information, in violation of 18 U.S.C. § 2252A, the defendant,

**STEPHEN WILLIAM SPROUL,**

shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, Section 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

2. If any of the property described above, as a result of any act or omission of the defendant

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c) , shall be entitled to forfeiture of substitute property.

18 U.S.C. § 2253  
21 U.S.C. § 853(p)  
28 U.S.C. 2461(c)

Robert K. Hur / gub  
Robert K. Hur  
United States Attorney

Date: October \_\_, 2019

I hereby attest that the foregoing is a full, true and correct copy of the original filed in my office and in my legal custody on 10/1/19  
FELICIA C. CANNON  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
By [Signature] Deputy